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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury '08 CR 1192 BEN

UNITED STATES OF AMERICA, Plaintiff, v. FORTINO ALVARADO ORTEGA (1), ALEJANDRO ROSAS-CAMPIZ (2), Defendants.	Criminal Case No. ____________ I N D I C T M E N T Title 8, U.S.C., Sec. 1324(a)(2)(B)(ii) - Bringing in Illegal Aliens for Financial Gain; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 8, U.S.C., Secs. 1324(a)(1)(A)(ii) and (v)(II) - Transportation of Illegal Aliens and Aiding and Abetting

The grand jury charges:

Count 1

On or about February 28, 2008, within the Southern District of California, defendants FORTINO ALVARADO ORTEGA and ALEJANDRO ROSAS-CAMPIZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Neri Alberto Hernandez-Acosta, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

On or about February 28, 2008, within the Southern District of California, defendants FORTINO ALVARADO ORTEGA and ALEJANDRO ROSAS-CAMPIZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Neri Alberto Hernandez-Acosta, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about February 28, 2008, within the Southern District of California, defendants FORTINO ALVARADO ORTEGA and ALEJANDRO ROSAS-CAMPIZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Omar Cuellar-Castillo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 4

On or about February 28, 2008, within the Southern District of California, defendants FORTINO ALVARADO ORTEGA and ALEJANDRO ROSAS-CAMPIZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Omar Cuellar-Castillo, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 5

On or about February 28, 2008, within the Southern District of California, defendants FORTINO ALVARADO ORTEGA and ALEJANDRO ROSAS-CAMPIZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Pedro Garcia-Mateo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 6

On or about February 28, 2008, within the Southern District of California, defendants FORTINO ALVARADO ORTEGA and ALEJANDRO ROSAS-CAMPIZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Pedro Garcia-Mateo, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

DATED: April 16, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:

JEFFREY D. MOORE
Assistant U.S. Attorney